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8 *Attorneys for Plaintiffs*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 JOHN GURNER and MICHELLE
12 GURNER, husband and wife; CLAIRE
13 GURNER; and CAMERON GURNER,

14 Plaintiffs,

15 vs.

16 AMERICAN FAMILY MUTUAL
17 INSURANCE COMPANY, a Wisconsin
18 company,

19 Defendant.

Case No. 3:24-cv-00158-MMD-CSD

**STIPULATION TO EXTEND THE
DEADLINE FOR PLAINTIFFS TO
REPLY IN SUPPORT OF THEIR
MOTION TO AMEND**

20 Pursuant to Rule IA 6-1 of the Local Rules of Practice for the United States District
21 Court, District of Nevada, Plaintiffs John Gurner, Michelle Gurner, Claire Gurner, and
22 Cameron Gurner (collectively, the “Plaintiffs”), by and through their counsel of record, and
23 Defendant American Family Mutual Insurance Company (“Defendant”) (collectively with
24 Plaintiffs, the “Parties”), by and through its counsel of record, stipulate and agree to extend
25 the deadline for Plaintiffs to reply in support of their Motion to Amend Complaint
26 (“Plaintiffs’ Motion”), which was filed on April 7, 2025 as follows:

- 27 1. Plaintiffs’ Motion was filed on April 7, 2025.
- 28 2. Defendant’s Response was filed on April 21, 2025.
3. The current deadline for Plaintiffs to file a reply in support of their Motion is April 28, 2025.
4. Plaintiffs’ counsel had multiple depositions in other cases that were previously scheduled during the week of April 21, 2015, and were not able to prepare Plaintiffs’ reply by the current deadline.

1 5. The Parties have agreed to provide Plaintiffs with an extension until May 2,
2 2025 to file their Reply.

3 5. This is the Parties' first request for an extension for Plaintiffs' Reply in
4 Support of Plaintiffs' Motion to Amend.

5 This extension is made in good faith in light of the present circumstances and the
6 issues presented in Plaintiffs' Motion to Amend.

7 RESPECTFULLY SUBMITTED this 28th day of April 2025.

8 POLI, MOON & ZANE, PLLC

9 By /s/ Michael N. Poli

10 Michael N. Poli
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15 WAYTE & CARRUTH LLP

16 By /s/ Jonathan W. Carlson

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23 IT IS SO ORDERED.

24 
25 Honorable Craig S. Denney
26 United States Magistrate Judge

27 DATED: April 29, 2025